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LORNA G. SCHOFIELD

April 8, 2022

UNITED STATES DISTRICT JUDGE

By ECF

Hon. Lorna G. Schofield, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED. Unless the parties have mutually agreed to relevance redactions, Federal shall submit a letter explaining the legal basis for relevance redactions by **April 11, 2022**, and Maplewood shall respond by **April 13, 2022**.

Dated: April 8, 2022
New York, New York

RE: Consigli & Associates, LLC v. Maplewood Senior Living, LLC
Case No. 20-cv-07712 (LGS)

Dear Judge Schofield:

We represent non-party Federal Insurance Company (“Federal”), in the above-referenced matter. Please accept this letter in furtherance of Your Honor’s Order dated April 5, 2022 (Docket Entry “DE” 188) (the “Order”) directing that, unless the parties have mutually agreed to relevance redactions, Federal shall file a letter by April 8, 2022 explaining the legal basis for the relevance redactions.

In furtherance of the Order, we have been meeting-and-conferring with counsel for Maplewood in an effort to not have to seek any further judicial assistance at this time. Although we hope to not have to submit anything further to the Court, Federal, with the consent of Maplewood, respectfully requests that Federal’s deadline to submit the aforementioned letter to the Court be extended to April 11, 2022, with Maplewood’s response deadline, if necessary, being extended to April 13, 2022. We thank Your Honor for your consideration of this matter and remain available at Your Honor’s convenience should Your Honor have any questions.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ Michael R. Morano

Michael R. Morano

MRM/mcd

cc: All parties of record (by ECF)